



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317/232-8603

VIA CERTIFIED MAIL - P404-637-539

January 17, 1991

Mr. M. Kent Newton
Krieg, DeVault, Alexander, and Capehart
One Indiana Square Suite 2800
Indianapolis, IN 46204

EPA Region 5 Records Ctr.



305969

Re: Closure Plan
Notice of Deficiency
Technical Review
Johnson Controls, Inc.
Goshen, IN
IND009549593

Dear Mr. Newton:

The Indiana Department of Environmental Management (IDEM) has reviewed the closure plan for Johnson Controls, Inc., dated October 1990. The closure plan has been reviewed for technical adequacy and determined to be inadequate pursuant to 329 IAC 3.

The enclosed Notice of Deficiency (NOD) outlines the specific deficiencies and provides discussions relevant to the revision. The information requested by the NOD must be submitted, in full, as an amended closure plan. This is required before the closure plan may be considered technically adequate.

The completed closure plan must be received by this office within thirty (30) days of the date of this notice. Each page of your submission must be uniquely numbered and must have the date of the submission.

Please submit four (4) copies of the amended closure plan to the IDEM to the address above.

Also enclosed is the document, "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities". This guidance should assist you in submitting a complete closure plan.

Mr. M. Kent Newton
Page 2

If you have any questions regarding this matter, please contact Mr. Stephen West, at (317)232-3264.

Sincerely,

A handwritten signature in dark ink, appearing to read "Victor P. Windle". The signature is fluid and cursive, with the first name "Victor" and last name "Windle" clearly distinguishable.

Victor P. Windle, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

SDW

Enclosures

cc: Mr. Hak Cho, U.S. EPA, Region V
Mr. Fred Rouse, Cole Associates
Ms. Fayola Wright, U.S. EPA, Region V (Without Enclosure)
Mr. Barry Steward
Ms. Laura Lightbody



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317/232-8603

Goshen Public Library
601 S. Fifth Street
Goshen, Indiana 46526

December 19, 1990

Re: Johnson Controls, Inc.
Closure of Hazardous Waste
Management Facility
Public Participation

Dear Sir/Madam:

Hazardous waste treatment, storage, or disposal facilities may undergo partial or total closure. Partial closure means the proper closure of certain hazardous waste management units at a facility that contains other active hazardous waste management units. Total closure is the proper closure of all hazardous waste units at the facility. Prior to the closure, the facility must submit a closure plan to the Indiana Department of Environmental Management (IDEM) which specifies how the hazardous waste unit(s) will be closed in a manner that controls, minimizes, or eliminates any impact on human health and the environment. The plan must be approved by the IDEM before it can be implemented.

Indiana Rule 329 IAC 3-21-3 provides the public an opportunity to submit comments on the plan. The following company: Johnson Controls, Inc., 1302 S. Monroe Street, Goshen, Indiana, has provided the IDEM with a notification of closure and has submitted a total closure plan. Enclosed is a copy. Please make available for public examination this letter and the enclosed information for a period of sixty (60) days.

If you have any questions concerning this matter, please contact Stephen West of my staff at AC 317/232-3264.

Sincerely,

Victor P. Windle, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

SW/go

Enclosure

cc: Mr. Hak Cho, U.S. EPA, Region V
Ms. Fayola Wright, U.S. EPA, Region V

An Equal Opportunity Employer



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317/232-8603

December 18, 1990

News Director
Goshen News
114 S. Main Street
Goshen, Indiana 46526

Re: Public Notice of Closure
Johnson Controls, Inc.
IND 009549593

Dear Sir/Madam:

Enclosed is a copy of our public notice regarding closure of a hazardous waste storage facility located at 1302 S. Monroe Street, Goshen, Indiana. Please publish this notice, one time, on December 21, 1990.

Please provide a notarized form and clippings showing the date of publication. All charges should be billed to the Department of Environmental Management, Office of Solid and Hazardous Waste Management. If a separate invoice is sent, be sure to include the publication date of the notice on the invoice.

Your timely attention to this matter is appreciated.

Sincerely,

Victor P. Windle, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

SDW/go

Enclosure

cc: Ms. Kathy Prosser, Commissioner (with enclosure)
Ms. Glynda Oakes
Office of External Affairs (with enclosure)
Mr. Steve Gale, Voucher Section (with enclosure)
Mr. Hak Cho, U.S. EPA, Region V (with enclosure)
Ms. Fayola Wright, U.S. EPA, Region V (with enclosure)

Closure Plan
Notice of Deficiency
Technical Review
Johnson Controls
Goshen, IN
IND009549593

The following comments and deficiencies were noted:

GENERAL REQUIREMENTS:

Closure Performance Standard

1. The closure performance standard paragraph on page 3 only mentions the container storage areas. The tank system must also be closed to meet the standard of 329 IAC 3-21-2.

Closure Cost Estimate

2. All closure cost items in Table 5, Estimated Cost of Closure, have been delineated as total hours and unit cost except certification. Provide the estimated costs.
3. Indicate the difference between #7 Administration, and #10 Administrative Expenses.
4. Does the decontamination cost, #6 in Table 5 include the wash/rinse water disposal cost?

CONTAINER STORAGE:

1. It is IDEM policy that the first two feet of soil be tested at six (6) inch intervals (6, 12, 18, and 24 inch depths). The initial sampling event should include these four (4) sampling depths at each boring.
2. In determining background levels, four (4) borings are required with sampling at the same depth intervals as the soil samples (6, 12, 18, and 24 inches).
3. Concerning the concrete floor of the current storage building at WMU #1 and #2:
 - a. It must be inspected for any cracks, gaps, or stains;
 - b. Any cracks in the concrete floor should be sealed prior to rinsing or decontamination.

- c. Scraped or steam cleaned to remove all visible contamination and triple rinsed;
 - d. All rinsates and residues will be collected and disposed of as hazardous waste.
 - e. The final rinsewater should be collected separately and analyzed for VOC's to show that the pad is clean and meets the closure performance standard.
 - f. "Clean" levels for the rinsewater will be method detection limits.
4. The boring locations proposed for the WMU #1 and #2 are not appropriate. The soil underlying the current storage building should be sampled to check for contamination at the former units. Coring through the concrete, sampling the soil, and backfilling and sealing the pad is suggested.

TANK STORAGE:

Facility Description (329 IAC 3-21)

- 1. Provide additional details about the Tank System:
 - a. material of construction
 - b. type
 - c. secondary containment, if any
 - d. ancillary equipment: piping - sizes, material of construction, location, valves, and pumps.

Closure Procedures (329 IAC 3-21-3(b)(3), 329 IAC 3-21-3(b)(4))

- 2. Provide additional information about the tank system removal and decontamination. Indicate if these procedures included the ancillary equipment.
- 3. In the event that all contaminated soil in the tank area cannot be practically removed, and clean closure cannot be achieved, a post-closure plan shall be submitted to the IDEM.

MISCELLANEOUS:

- 1. In Table 4, page 7, provide the following:
 - a. SW-846 method number for arsenic analysis.
 - b. Change TPH method from 8100 to 8015. Method 8100 is for Polynuclear Aromatic Hydrocarbons.
 - c. Justify detection limits for the parameters of arsenic and lead.

2. On page 7, delete the last sentence stating: "If excavation and decontamination is restricted by permanent structures, these areas will be addressed under the RCRA corrective action provisions (40 CFR 264.01)". Corrective action is not appropriate for this purpose.
3. Provide a description of the sampling of the soils to further determine the horizontal and vertical extent of contamination found, if any.
4. Provide a description of excavation equipment and techniques.
5. All sampling results sent to the IDEM for review should include the appropriate QA/QC results for each analysis.

Tax I.D. #1-35-0547410-00

Johnson Controls
JCIC

Form Prescribed by State Board of Accounts

General Form No. 99 P (Rev. 1957)

Dept. of Environmental Management To News Printing Company Dr.
(Governmental Unit)

Elkhart

County, Indiana

114 S. Main St., Goshen, IN 46526

9 25 AM '90

PUBLISHER'S CLAIM

LINE COUNT

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72

72

COMPUTATION OF CHARGES

72 lines, 1 columns wide equals 72 equivalent

lines at .238 cents per line

\$ 17.14

Additional charge for notices containing rule and figure work
(50 percent of above amount)

Charge for extra proofs of publication
(50 cents for each proof in excess of two)

TOTAL AMOUNT OF CLAIM

\$ 17.14

DATA FOR COMPUTING COST

Vinyl & aluminum siding
roofing, windows, remodeling
& additions, 10% discount on
all work booked for completion
Jan-March. For free estimate
call Dave at 457-5498 after 7pm W
(291)

Size of type 6 point

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| Type | 13 Em Column | 13.5 Em Column | 14 Em Column | 14.5 Em Column | 15 Em Column |
|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|
| 12 | .172 | .178 | .185 | .191 | .198 |
| 10 | .206 | .214 | .222 | .230 | .238 |
| 9 | .229 | .238 | .246 | .255 | .264 |
| 8 | .257 | .267 | .277 | .287 | .297 |
| 7.5 | .275 | .285 | .296 | .306 | .317 |
| 7 | .294 | .305 | .317 | .328 | .339 |
| 6 | .343 | .356 | .370 | .383 | .396 |
| 5.5 | .374 | .389 | .403 | .417 | .432 |
| 5 | .429 | .444 | .460 | .476 | .492 |
| 4 | .515 | .535 | .554 | .574 | .594 |
| 3 | .644 | .668 | .693 | .718 | .743 |
| 2 | .858 | .888 | .924 | .959 | .994 |
| 1 | 1.080 | 1.177 | 1.277 | 1.383 | 1.488 |
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| 12 | .139 | .145 | .152 | .158 | .165 |
| 10 | .166 | .174 | .182 | .190 | .198 |
| 9 | .185 | .193 | .202 | .211 | .220 |
| 8 | .208 | .218 | .228 | .238 | .248 |
| 7.5 | .222 | .232 | .243 | .253 | .264 |
| 7 | .238 | .249 | .260 | .271 | .283 |
| 6 | .277 | .290 | .304 | .317 | .330 |
| 5.5 | .302 | .317 | .331 | .346 | .360 |
| 5 | .354 | .370 | .387 | .403 | .419 |
| 4 | .444 | .465 | .486 | .507 | .528 |
| 3 | .554 | .581 | .607 | .634 | .660 |
| 2 | .693 | .726 | .759 | .792 | .825 |
| 1 | 1.080 | 1.177 | 1.277 | 1.383 | 1.488 |
| No. of insertions | No. of insertions | No. of insertions | No. of insertions | No. of insertions | No. of insertions |